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1 MS. SWARTZ: Good evening. My name is Ginger
2 Swartz, and I represent the Office of the Governor, Agency for
3 Nuclear Projects, and my task tonight is to present a statement
4 on behalf of Robert Loux, the executive director for the Agency
5 for Nuclear Projects.

6 The National Environmental Policy Act of 1969 is
7 our basic national charter for protection of the environment.
8 Among its purposes and of great importance in considering a
9 high-level nuclear waste disposal site at Yucca Mountain is
10 fulfilling the responsibilities of each generation as trustee
11 of the environment for succeeding generations.

12 The NEPA process of which this Draft
13 Environmental Impact Statement is part is intended to help
14 public officials make decisions that are based on understanding
15 of environmental consequences and take actions that protect,
16 restore and enhance the environment.

17 The environment referred to in NEPA includes the
18 human environment and protection of human health and safety is
19 implicit in the goals of the Act.

20 The NEPA procedures are designed to assure that
21 environmental information is available to public officials and
22 citizens before decisions are made and before actions are
23 taken, and the purpose of the NEPA regulations is to assure
24 that federal agencies respond according to the letter and the
25 spirit of the Act.

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1 We're here today because the NEPA regulations
2 include the requirement that federal agencies hold hearings to
3 record and then consider the comments of the public on EIS's
4 they tend to issue -- intend to issue.

5 In the Final EIS, agencies must incorporate these
6 comments or explain why they did not incorporate them.
7 Agencies must also accept written comments from the public on
8 the Draft EIS's they issue.

9 In participating in the NEPA process with the
10 proposed Yucca Mountain high-level nuclear waste repository
11 project, it is important to remember that this is not just
12 another federal project.

13 The Yucca Mountain program is entirely
14 unprecedented in its scope, its time frame, the geographical
15 area it encompasses as a result of the nationwide nuclear
16 materials transportation campaign that it requires and in terms
17 of the nature and extent of the potential impacts associated
18 with it.

19 Yet this draft document treats Yucca Mountain as
20 if it were just another dam, pier or road.

21 Given the transportation scenarios contained in
22 the Draft EIS, rural Nevada communities such Tonopah,
23 Goldfield, Beta -- Beatty and Amargosa Valley could be more
24 heavily impacted by shipments of radioactive material destined
25 for Yucca Mountain than any other community in the country.

EIS000193

1 This is because two of the proposed rail spur
2 routes, at least one of the heavy haul truck routes, and an
3 alternative route for legal weight truck shipments pass through
4 or very close to these communities.

5 All or nearly all of the spent fuel and high-
6 level waste slated for disposal could be shipped through
7 northern Nye and Esmeralda Counties.

8 | According to the Draft EIS, Tonopah, Goldfield
9 and Beatty are potentially affected by construction and
10 operation of the Caliente and Carlin rail corridors.

2 11 Either of these corridors could carry up to
12 19,850 rail shipments of spent nuclear fuel and high-level
13 radioactive waste to the repository.

14 Maps in the DEIS fail to identify the exact
15 location of the quarter mile wide rail corridors, but do
16 indicate they could be located within five to eight miles of
17 Tonopah, within four to seven miles of Goldfield and within two
18 to five miles of Beatty. |

3... 19 | The Draft EIS largely ignores adverse
20 environmental impacts of rail construction and operation on
21 Tonopah, Goldfield and Beatty.

22 Under certain circumstances, these three
23 communities would be close enough to the repository rail line
24 to require evacuation in the event of a severe accident or
25 terrorist attack.

3 cont.

1 A rail accident or incident releasing radioactive
2 materials would threaten public health and safety and harm the
3 local economy.

4

4 Even without accidents, proximity to the
5 repository rail line would result in adverse socioeconomic
6 impacts due to public perception of risks and the stigmatizing
7 potential of the rail corridor.

8 The Draft EIS identifies Tonopah, Goldfield and
9 Beatty as potentially affected by heavy haul truck shipments of
10 spent nuclear fuel and high-level waste from a proposed
11 intermodal transfer facility at Caliente.

12 There could be up to 19,850 heavy haul shipments
13 along US 6 and US 95. The Draft EIS assumes an average of
14 eleven loaded trips per week from Caliente to Yucca Mountain
15 and eleven return trips of empty casks per week.

10

16 The analysis of heavy haul impacts is seriously
17 deficient for several important reasons: First, the document
18 fails to demonstrate the feasibility of large scale long-term
19 heavy haul shipments of spent nuclear fuel and high-level waste
20 in large rail casks.

21 Weighing 125 tons or more, moving over hundreds
22 of miles on public highways on a regular basis, the heavy haul
23 transport system proposed by DOE is completely unprecedented.

11...

24 Second, the Draft EIS fails to demonstrate the
25 feasibility of transporting heavy rail casks on 100 to 150 foot

EIS000193

11 cont.

1 long trailers through Hancock Summit, Tonopah, Goldfield and
2 other problem areas along the Caliente route.

3 The actual cost of upgrading this route could be
4 three to ten times greater than the Draft EIS estimate of 120
5 million dollars.

5

6 Third, the document grossly underestimates heavy
7 haul routine radiation doses to members of the public along the
8 route, particularly in Tonopah and Goldfield.

9 Stop times and reduced speeds due to
10 intersections, sharp curves, school zones and other local
11 conditions could result in significant cumulative exposures
12 within 150 yards of the highway.

6

13 Fourth, the Draft EIS underestimates the
14 consequences of severe accidents and terrorist sabotage
15 incidents involving heavy haul shipments through Tonopah,
16 Goldfield and Beatty.

17 The close proximity of the highway to hotels,
18 casinos, retail businesses, schools, churches and residences
19 would increase human health effects in the event of an accident
20 or incident involving loss of cask containment or shielding.

21 Proximity to the route would increase the
22 economic consequences of a heavy haul truck accident or
23 incident, even one involving no loss of cask integrity.

7...

24 Fifth, the Draft EIS ignores the potential of
25 significant adverse socioeconomic impacts along heavy haul

EIS000193

7 cont.

1 routes due to public perception of risk and stigma effects.

2 Such impacts could include reduced property
3 values, reduced income for existing businesses and loss of new
4 investments.

5 The Draft EIS also ignores the potential impacts
6 on Tonopah, Goldfield and Beatty of legal weight truck
7 shipments of spent nuclear fuel and high-level waste.

8

8 US 6 from Ely to Tonopah and US 95 from Tonopah
9 to Amargosa valley are identified as potential state designated
10 preferred routes in Appendix J if you're looking for this kind
11 of information.

12 According to the Draft EIS, there could be as
13 many as 96,000 legal weights shipments to the repository under
14 the mostly truck scenario.

15 The adverse impacts of these shipments would be
16 similar to those of heavy haul shipments. The larger number of
17 legal weight shipments averaging five to ten trucks or more per
18 day could result in higher routine radiation exposures and
19 heightened levels of risk.

20 The State of Nevada will be submitting extensive
21 written comments on this Draft Environmental Impact Statement.

9

22 It is our hope that these comments and those of all others will
23 be seriously considered and that a reasonable no action
24 alternative will be selected as the preferred action in the
25 Final Environmental Impact Statement.

EIS000193

1 Thank you.

2 MR. LAWSON: Thank you very much.

3 MS. BOOTH: Thank you.

4 MR. LAWSON: Next will be Jamieson Walker to be

5 followed by Mike Anderson and Marsha Hoffman.

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